

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Mail Stop 513

OCT 4 1978

Mr. P. B. Norgaard
Atlantic Richfield Company
P.O. Box 360
Anchorage, Alaska 99510

Dear Mr. Norgaard:

The Prevention of Significant Deterioration (PSD) permit application submitted by the Atlantic Richfield Company and the SOHIO Petroleum Company for new facilities in the Prudhoe Bay Oil Field has been reviewed by our technical staff. Before your application can be considered complete, additional information on the following items is required:

1. Physical Stack Height - Apparently the heights for many stacks that were used in the modeling were taken from engineering drawings and do not reflect the true height above the ground. Consideration of the total stack height above ground may result in reduced concentrations for the several hot spots identified in the modeling analysis. A discussion of the affect on the modeling results of using stack heights other than the actual stack heights is needed.
2. Plume Rise - The NSPS support document suggests that for gas turbines 70% of the normal Briggs plume rise should be used. The Company should discuss and defend the use of the full plume rise in their calculations or remodel using the 70% figure.

USEPA REG



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MM.JOHNSTON ps:10-2-78 (\$6858A)		CONCURRENCES					
SYMBOL	MM.Johnston						
SURNAME	<i>[Handwritten signature]</i>						
DATE	OCT 3, 1978						

If you have any questions regarding technical aspects of these points, please contact Robert Wilson at (206) 442-0887. Administrative questions should be directed to me at (206) 442-1387.

Sincerely,

Michael M. Johnston, Chief
Air Compliance Evaluation Section

CC: Mr. Dave Estes, ADEC
Mr. Bob Chivvis, EPA
Mr. Charles Fahl, Dames and Moore
Mr. G. N. Nelson, SOHIO
Mr. W. P. Metz, ARCO